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*Counsel for FedEx Supply Chain Logistics & Electronics, Inc.*

**IN THE UNITED STATES BANKRUPTCY COURT  
 FOR THE NORTHERN DISTRICT OF TEXAS  
 DALLAS DIVISION**

-----	§	Chapter 7
In re:	§	
	§	
GOODMAN NETWORKS, INC.	§	Case No. 22-31641 (MVL)
	§	
Debtor.	§	
.....	§	

**FEDEX SUPPLY CHAIN LOGISTICS &  
 ELECTRONICS, INC.’S JOINDER TO THE EMERGENCY MOTION  
 FOR CONTEMPT AND RESPONSE TO THE MOTION TO QUASH SUBPOENAS**

FedEx Supply Chain Logistics & Electronics, Inc. (“FSCLE”) files this joinder to the *Original Petitioners’ Emergency Motion for Contempt and Response to the Motion to Quash Subpoenas* (the “Motion for Contempt”) [Docket No. 117]. FSCLE shows as follows:

1. Pursuant to duly issued subpoenas and an order of this Court on the record at the hearing held on November 28, 2022, James Goodman was required to appear for a deposition in connection with this case on December 8, 2022 at 9:30 a.m. FSCLE issued and served a subpoena

on Mr. Goodman, and Mr. Goodman, through counsel, agreed to schedule the deposition on December 8, 2022, alongside the depositions sought by the original petitioning creditors (the “Original Petitioners”) and ARRIS Solutions, Inc. A copy of the FSCLE subpoena is attached as **Exhibit A**.

2. Mr. Goodman was the incorporator for the Debtor and has been a director and officer of Goodman Networks, Inc., the alleged debtor (the “Debtor”). In addition, Mr. Goodman, through his consulting firm, People NQ, exercised control over the Debtor during many of the transactions at issue in this case. Mr. Goodman signed the Asset Purchase Agreement [Docket No. 43-1, Exhibit A] that is at issue in this case.

3. Mr. Goodman did not appear at his deposition on December 8, 2022, and, instead, filed a second motion to quash (the “Motion to Quash”). [Docket No. 116].

4. The Original Petitioners filed their Motion for Contempt and ARRIS joined [Docket No. 119]. Now, FSCLE joins the Motion for Contempt and adopts the arguments and authorities stated in the Motion for Contempt and ARRIS’s joinder.

5. FSCLE attempted to negotiate a stipulation in lieu of deposition and/or the resetting of the December 8<sup>th</sup> deposition with counsel for Mr. Goodman, but FSCLE’s attempts to negotiate were not reciprocated. Instead, Mr. Goodman filed the Motion to Quash arguing that the deposition was moot based on representations the Debtor had made to him but not to any of the creditors in the case.

6. Mr. Goodman did not have good cause to evade his deposition and file the Motion to Quash. Given his first motion to quash was denied, FSCLE asserts a second motion to quash was filed in bad faith.

7. FSCLE through its counsel Butler Snow has incurred costs and fees related to Mr. Goodman's course of conduct in evading these depositions, including costs related to the remote deposition platform arranged by Veritext.

8. WHEREFORE, for these reasons and the reasons discussed in the Motion for Contempt, FSCLE moves to join the Motion for Contempt and respectfully requests that the Court (1) deny Mr. Goodman's Motion to Quash; (2) compel Mr. Goodman to appear for a deposition; (3) award FSCLE its costs and fees as a sanction for Mr. Goodman's non-compliance; and (4) grant such other and further relief as the Court deems just and proper.

Dated: December 12, 2022

**BUTLER SNOW LLP**

/s/ Candice M. Carson

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**CERTIFICATE OF SERVICE**

I, Candice M. Carson, certify that the foregoing pleading was filed electronically through the Court's ECF system and served electronically on all parties enlisted to receive service electronically in this case.

Dated: December 12, 2022

/s/ Candice M. Carson  
CANDICE M. CARSON